1 2	KEVIN V. RYAN (CSBN 118321) United States Attorney		
3	MARK L. KROTOSKI (CSBN 138549) Chief, Criminal Division		
4 5	JEFFREY D. NEDROW (CSBN 161299) Assistant United States Attorney		
6 7	150 Almaden Boulevard, Suite 900 San Jose, California 95113 Telephone: (408) 535-5045		
8	Attorneys for Plaintiff		
9	UNITED STATES DISTRICT COURT		
10	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
11	UNITED STATES OF AMERICA,) No. CR 06-00281-JW		
12	Plaintiff,		
13	v. STIPULATION AND [PROPOSED] v. ORDER RE: CONTINUANCE OF		
14	STEVEN HEINZ, STEVEN HEINZ, STEVEN HEINZ,		
15	Defendant.		
16)		
17	The parties, by and through their counsel of record, hereby stipulate to the following:		
18	1. The parties request that the Court continue the sentencing hearing presently set for		
19	October 2, 2006 to October 16, 2006.		
20	2. The parties stipulate and request that the Court find the following as a factual basis for		
21	continuing the sentencing:		
22	Additional time is required to prepare this matter for sentencing. The government only		
23	recently completed transmission of information necessary to complete the Presentence		
24	Investigation process, and additional time was required to complete the Presentence Report as a		
25	result of the government's recent submission of information. The continuance is requested to		
26	afford the parties an opportunity to respond to the draft Presentence Report, to receive a final		
27	Presentence Report, and appropriately prepare for sentencing.		
28	3. For the above-described reasons, the parties respectfully request a continuance of the		
	STIPULATION CR 06-00281-JW		

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1	sentencing hearing from October 2, 2006 to October 16, 2006 at 1:30 p.m. The probation officer		
2	has been advised of this requested continuance.		
3			
4		VIN V. RYAN ited States Attorney	
5		/s/	
6	DATE JEI	FFREY D. NEDROW	
7	Ass	sistant United States Attorney	
8		/s/	
9	DATE Att	GELA HANSEN corney for Defendant even Heinz	
10	Steven Heinz		
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